

# **EXHIBIT A**

**KNIGHT  
FIRST AMENDMENT  
INSTITUTE**

at Columbia University

March 12, 2018

***Via ECF and Email***

The Honorable Andrew L. Carter, Jr.  
United States District Court  
Southern District of New York  
40 Foley Square, Room 435  
New York, NY 10007

**Re: *Knight First Amendment Institute v. U.S. Department of  
Homeland Security, et al., Case No. 17-CV-7572 (ALC)***

Dear Judge Carter,

Pursuant to Federal Rule of Civil Procedure 15(a)(2), on March 8, 2018, Defendants' counsel provided written consent for the filing of an amended complaint. Attached hereto as Exhibit 1 is the email reflecting that consent.

Respectfully,

/s/ Jameel Jaffer

Jameel Jaffer (JJ-4653)  
Alex Abdo (AA-0527)  
Carrie DeCell (CD-0731)  
Knight First Amendment Institute  
at Columbia University  
475 Riverside Drive, Suite 302  
New York, NY 10115  
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(646) 745-8500

*Counsel for Plaintiff*

/s/ Catherine Crump

Catherine Crump (CC-4067)  
Megan Graham (*pro hac vice*)  
Samuelson Law, Technology &  
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University of California, Berkeley,  
School of Law  
433 Boalt Hall, North Addition  
Berkeley, CA 94720-7200  
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(510) 642-5049

*Counsel for Plaintiff*

cc: Ellen Blain, Esq. (via Email)

# **EXHIBIT 1**

**Subject:** RE: Knight v. DHS et al., 17 Civ. 7572 (SDNY)  
**Date:** Thursday, March 8, 2018 at 9:05:53 AM Eastern Standard Time  
**From:** Blain, Ellen (USANYS)  
**To:** Carrie DeCell

Carrie,  
The government consents to plaintiff filing an amended complaint to add ICE as a defendant in connection with the FOIA request at issue. Thanks,  
Ellen

Ellen Blain  
Assistant United States Attorney  
Southern District of New York  
86 Chambers Street  
New York, New York 10007  
Tel. (212) 637-2743  
Fax (212) 637-2730

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**From:** Carrie DeCell [mailto:Carrie.DeCell@knightcolumbia.org]  
**Sent:** Thursday, March 8, 2018 8:32 AM  
**To:** Blain, Ellen (USANYS) <EBlain@usa.doj.gov>  
**Subject:** Knight v. DHS et al., 17 Civ. 7572 (SDNY)

Hi Ellen,

Following up on our conversation earlier this week, would you please confirm that the government consents to the filing of an amended complaint in this case?

Thanks very much,

Carrie

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Carrie DeCell  
Knight First Amendment Institute at Columbia University  
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